

REMARKS/ARGUMENTS

At the outset, Applicant wishes to thank the Examiner for the indication that the present application contains allowable subject matter. In the Office Action, claims 7, 26, 29, 34-35, 39-41, 54, 66 and 77 are indicated as being allowable if rewritten in independent form.

Claims 1-26, 28-41, 46-78 and 83 were pending in the Office Action. Upon entry of the present paper, claims 1, 3, 16, 24, 35, 60, 64 and 75 are amended, claims 2, 17, 34, 63, 65, 66, 76 and 77 are canceled without prejudice or disclaimer, and claims 1, 3-16, 18-26, 28-33, 35-41, 46-62, 64, 67-75, 78 and 83 remain pending. Aside from the allowable claims identified above, the other claims stand rejected as follows:

- claims 1-6, 8-25, 28, 33, 36-38, 46-53, 55-65, 67-78 and 83 stand rejected under 35 U.S.C. 102(b) as being anticipated by Muniyappa et al. (U.S. Patent No. 6,092,200);
- claims 31-32 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Muniyappa et al. and Genty et al. (U.S. Patent No. 6,675,225); and
- claims 46-53 and 55-59 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Muniyappa et al. and Frailong et al. (U.S. Patent No. 6,012,100).

Applicant addresses these rejections below.

Independent Claims 1 and 16, and Dependent Claims 3-15 and 18-23

Dependent claim 2 has been canceled without prejudice or disclaimer. Applicants have amended independent claim 1 to incorporate language previously found in dependent claim 2.

In rejecting claim 2, the Office Action relied on Muniyappa et al.'s master node receiving public or private keys from the Certification Authority 80. As noted in the Office Action, this is discussed at col. 4, lines 43-56 and col. 5, lines 53-63. In those portions of Muniyappa et al., the various "slave" nodes query the Certification Authority 80 to receive a public key for the master node. This request for a public key is not "a request for obtaining a secure domain name

address,” as recited in amended claim 1. There is no teaching or suggestion that the Muniyappa et al. public key is a secure domain name address. Accordingly, Applicant respectfully submits that amended claim 1 and remaining dependent claims 3-15 distinguish over Muniyappa et al.

Dependent claim 17 has been canceled, and its base independent claim 16 has been amended to recite language formerly found in claim 17. This language also recites, among other features, “sending a request from a first VPN device to an on-line database connected to the telecommunications network for obtaining a secure domain name address associated with a second VPN device,” and the Office Action relies on the same analysis of claim 2 to reject claim 17. As discussed above, the cited portion of Muniyappa et al. refers to the “slave” nodes requesting a public key for the master node, and not “for obtaining a secure domain name address associated with a second VPN device,” as recited in amended claim 16. Accordingly, Applicant respectfully submits that amended claim 16 and remaining dependent claims 18-23 distinguish over Muniyappa et al.

Independent Claim 24 and Dependent Claims 25-26, 28-33 and 35-41

Dependent claim 34 has been canceled without prejudice or disclaimer. The Office Action indicated that claim 34 would be allowable if written in independent form, and the present amendment amends base independent claim 24 to recite language formerly found in claim 34. Accordingly, independent claim 24, and remaining dependent claims 25-26, 28-33 and 35-41 are believed to be in allowable condition.

Independent Claim 60 and Dependent Claims 61-62, 64 and 67-74

Dependent claims 63, 65 and 66 have been canceled without prejudice or disclaimer. The Office Action indicated that claim 66 would be allowable if written in independent form, and the present amendment amends base independent claim 60 to recite language formerly found in claim 66, as well as intervening claims 63 and 65. Accordingly, independent claim 60, and remaining dependent claims 61-62, 64 and 67-74, are believed to be in allowable condition.

Independent Claim 75 and Dependent Claim 78

Dependent claims 76 and 77 have been canceled without prejudice or disclaimer. The Office Action indicated that claim 77 would be allowable if written in independent form, and the present amendment amends the base independent claim 75 to recite language found in claim 77. Accordingly, claim 75 is believed to be in allowable condition, together with remaining dependent claim 78.

Independent Claim 46 and Dependent Claims 47-59 and 83

As an initial matter, the Office Action includes claims 46-53 in the listings of the claims that are rejected under both 35 U.S.C. 102(b) and 103(a), but these claims are not addressed in the discussion of the 102(b) rejections, and the Office Action concedes that the Muniyappa et al. reference fails to teach or suggest at least one of the claimed features in these claims (page 16). Applicants believe the Office Action intended to reject these claims only under 35 U.S.C. 103(a), and Applicant requests withdrawal of the rejection of these claims under 102(b) (or, in the alternative, a discussion of the rejection applying Muniyappa).

Amended independent claim 46 recites, among other features, “a memory containing a certificate that has been signed by a certification authority, the signed certificate containing at least one VPN parameter for the VPN device that has been verified by the certification authority, and a plurality of pre-authorized name pairs having a local name and a remote name for a VPN.” The Office Action concedes that Muniyappa et al. fails to teach or suggest the recited plurality of pre-authorized name pairs, and cites Frailong in combination.

Frailong does not teach or suggest such a feature. The portion cited in the Office Action, col. 18, lines 46-54, refer to three levels of certificates that are issued by the Certification Authority (CA). Frailong refers to two (and only two) “names” contained in its certificate: an “issuer distinguished name” and a “subject distinguished name”. These names, however, refer to the CA itself. At col. 19, lines 33-45, Frailong explains that the “issuer name” is a name of “the particular manufacturing Certification Authority that signed it,” and offers no discussion of a CA having to “authorize” its own name. Accordingly, Frailong fails to teach or suggest a “plurality of pre-authorized name pairs having a local name and a remote name for a VPN,” as recited in claim 46.

Applicant submits that claim 46 distinguishes over the alleged combination of references, and is in condition for allowance. Claims 47-59 and 83 depend from claim 46, and are allowable for at least the same reasons as claim 46, and further in view of the features recited therein.

Conclusion

For at least the reasons set forth above, Applicant submits that pending claims 1, 3-16, 18-26, 28-33, 35-41, 4662, 64, 67-75, 78 and 83 are in condition for allowance. However, if the Examiner feels that additional discussion and/or amendment would be helpful, the Examiner is invited to telephone the Applicant's undersigned representative at the number appearing below.

Respectfully submitted,
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